

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

JOSEPH J. HESKETH III, *on his behalf and on
behalf of other similarly situated persons,*

Plaintiff,

v.

TOTAL RENAL CARE, INC., *on its own
behalf and on behalf of other similarly situated
persons,*

Defendants.

Case No: 2:20-cv-01733-JLR

DECLARATION OF CHRISTINA L HENRY
IN SUPPORT OF MOTION TO EXTEND
TIME TO FILE RESPONSE TO
DEFENDANT'S MOTION FOR JUDGMENT
ON THE PLEADINGS

NOTING DATE:

MARCH 26, 2021

I, Christina Henry, declare as follows:

1. I am an attorney for the Plaintiff Joseph J. Hesketh, III, and I am knowledgeable regarding the facts in this Declaration and am competent to testify to them.

2. Attached hereto as **Exhibit A** is a true and correct copy of an excerpt of the response to the First Set of Interrogatories sent to defendant Total Renal Care, Inc. ("TRC") declaration states that the contract is irrelevant because TRC answered that the handbook is provided to employees.

3. As the attorney for the Plaintiff, I also served several depositions and served them on TRC prior to the filing of TRC's motion for judgment on the pleadings. The depositions are in the process of being rescheduled at TRC's request, including the deposition of the person who signed the declaration found at Dkt. No. 12.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE

Executed this 18th day of March 2021 at Bothell, WA.

/s/ Christina L Henry
Christina Henry, WSBA 31273